

Brief Comments on RM-10784

If the FCC acts on other petitions for the removal of the CW licensing requirement for access to the HF spectrum as per the allowance of the WARC-03 ruling, then I ***support*** the Views of Mr. Dale E. Reich in his petition **RM-10784**.

As a long time amateur radio operator (1977), commercial radio operator (1971), amateur radio volunteer examiner (1986), and commercial radio volunteer examiner (1993), I do not believe that there is any burden on examiners or the FCC in keeping some form of CW testing requirement for amateur radio. Those of us who volunteer our time and effort as examiners take pride in announcing that “You passed the CW test!”.

CW is still required for the commercial radiotelegraph licenses, and is still used in some countries as a reliable means of communications, particularly between ships at sea. CW is a very basic form of communication which requires only a trained operator to decode. CW requires no other intervening communications hardware (satellite transponders, etc), and its “language” can be easily understood between various different cultures. CW requires only the most basic equipment to transmit and receive which is easy to construct and maintain. It is doubtful that all nations in the world will drop CW testing in the near future. Some countries have announced that they have no intentions of dropping the CW requirement for amateur radio.

I believe that some form of CW testing should remain for the very highest class of amateur radio license in the United States. The FCC should expect the ‘top class’ of amateur radio operator to be able to communicate in this most basic mode for emergency communication situations. It would be a shame if United States amateur radio operators were unable to communicate with other amateur radio operators in other parts of the world because we lacked this basic skill.

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